

AFFIDAVIT

I, Timothy Hoffmann, being sworn, depose and state as follows:

1) I am a Special Agent (SA) with the Drug Enforcement Administration (DEA).
2) I am assigned to the DEA's Burlington Resident Office (BRO). I was hired as a SA with
DEA in 2012, and completed my training in 2013. In connection with my duties and
responsibilities as a SA, I have received extensive training in the field of narcotics investigation
and enforcement. I have received training, both formal and informal, in the investigation of
violations of controlled substance offenses, including attending several schools regarding general
narcotics investigation. I completed the DEA Basic Agent Training Academy, located in
Quantico, Virginia. I have also received specialized training related to the investigation of
money laundering and other financial crimes related to drug trafficking. I have also participated
in investigations relating specifically to the possession and distribution of cocaine base, the drug
involved in this investigation and discussed herein. I have also participated in various aspects of
investigatory work, including but not limited to undercover surveillance and undercover
narcotics purchases, and I have participated in several narcotics-related arrests and the execution
of many narcotics-related search warrants. I have written affidavits in support of search and
arrest warrants, and I frequently utilize the services of informants and other confidential sources
of information.

3) I submit this affidavit to show probable cause to believe that on or about May 17, 2018,
Andrew Dontae WILLIAMS committed the offense of possession with intent to distribute
cocaine base, a schedule II controlled substance, in violation of 21 U.S.C. § 841(a).
4) The information contained in this affidavit comes from my personal observations and
knowledge, my training and experience, and information obtained from other agents, law

enforcement personnel, and witnesses. Since this affidavit is being submitted for the limited purpose of establishing probable cause, I have not included each and every fact known to me concerning this investigation.

Probable Cause

5) On May 17, 2018, myself and members of the DEA BRO conducted surveillance in Winooski Vermont. I observed a person, hereinafter referred to as Source of Information (SOI), walking from a vehicle on Main Street in Winooski to the general area of Weaver Street. Shortly thereafter, I saw the SOI leave a residence on Weaver Street with a large front porch, later determined to be 111 Weaver Street. I approached the SOI, who I knew to be a user of controlled substances. After confronting the SOI regarding whether it possessed controlled substances, SOI turned over to me approximately 7.4 grams of a rock-like substance I recognized to be cocaine base. I later conducted a field test of the cocaine base; results were a presumptive positive for the presence of cocaine base.

6) SA Matthew Cannon and I conducted a field interview with the SOI.¹ The SOI advised the following: It purchased the seized “crack” from “Sam” for \$500.00. The residence where the SOI purchased the “crack” was 111 Weaver Street. “Sam” was a young black male, well dressed, and wore glasses, who was from Pennsylvania. “Sam” was at the Motel 6 earlier that day, and his phone number was (802) 372-7106.

¹ The SOI has prior convictions for Vehicle Operation-Attempt to Elude Law Enforcement (Misdemeanor), Driving under the Influence #3 (Felony 2x), simple assault (Misdemeanor), Violation of Conditions of Release (Misdemeanor), Vehicle Operation - License Suspended (Misdemeanor), Sale of Cocaine, Less than 2.5 grams (Felony 2x), Retail Theft (Misdemeanor) and Conspiracy to Distribute Heroin and Cocaine Base (Felony). SOI provided information in return for consideration on possible future criminal charges concerning the seized cocaine base.

7) Members of the BRO continued surveillance at 111 Weaver Street, Winooski while the SOI was being debriefed. SA Kristian Pinkham and TFO John McGarghan observed an African American male, wearing glasses, and a grey button down shirt leave the residence, later identified by his Pennsylvania Identification Card as WILLIAMS. TFO McGarghan observed WILLIAMS enter a gold colored SUV with Pennsylvania registration.

8) TFO McGarghan observed WILLIAMS drive the gold SUV into the Winooski Beverage parking lot. Members of the BRO attempted to initiate contact with WILLIAMS, but WILLIAMS fled on foot from the SUV. WILLIAMS was apprehended after approximately 150 yards. Among things seized, TFO Chris May seized approximately \$3000 of U.S. Currency and a cellular phone. ^{From His Person.} (Vp)

9) The gold SUV was moved to the Winooski Police Department (WPD), where it was searched. During the search, SA Cannon located approximately 17 grams of suspected cocaine base and approximately \$5,500 of U.S. Currency which had been secreted below the center console of the SUV. I conducted a field test of the cocaine base; results were a presumptive positive for the presence of cocaine base. The combined USC was approximately \$8500.00.

10) I took a photograph of WILLIAMS, and showed it to the SOI. The SOI advised that the photograph of WILLIAMS depicted "Sam." I also called (802) 372-7106 (the number provided by SOI), and the cellular phone seized from WILLIAMS rang.

11) Following the arrest of WILLIAMS, I conducted a post arrest interview with him at WPD. Prior to investigative questioning, I read WILLIAMS his *Miranda* rights. WILLIAMS waived his rights and agreed to answer questions. Among other things, WILLIAMS told me he came to Vermont with 62 grams of powder cocaine and added 10 grams of baking soda to the cocaine, producing approximately 72 grams of cocaine base. WILLIAMS also admitted that he

had hidden the cocaine base and U.S. Currency in the center console of the SUV, and that the U.S. Currency was proceeds from selling cocaine base.

Conclusion

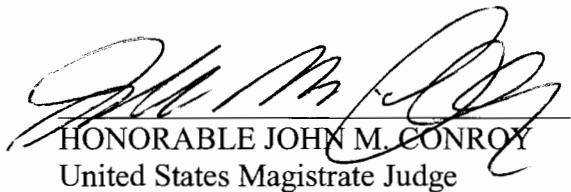
12) Based on the foregoing, I believe probable cause exists to believe that on or about May 17, 2018, Andrew WILLIAMS committed the offense of possession with intent to distribute cocaine base, a schedule II controlled substance, in violation of 21 U.S.C. § 841(a).

Dated at Burlington, in the District of Vermont, this 18th day of May, 2018.



TIMOTHY HOFFMANN
DEA Special Agent

Sworn and subscribed before me this 18th day of May, 2018.



HONORABLE JOHN M. CONROY
United States Magistrate Judge